

### **REMARKS**

In the Office Action, the Examiner rejected claims 10, 14 and 15 under 35 USC 112, and claims 1-10 and 25 under 35 USC 102. These rejections are fully traversed below.

Claims 10, 14, 15, 19 and 25 have been amended. Claims 26-33 have been added. Claims 1-33 are therefore pending in the application. Reconsideration of the application is respectfully requested based on the following remarks.

#### ***Specification***

The objection is believed to be overcome by the amendment made above. Particularly, the patent number of the parent application has been inserted (as suggested by the Examiner).

#### ***Claim Objections***

The objections are believed to be overcome by the amendments made above. Particularly, "when said substrate" has been removed from claim 19 and a space " " has been inserted between "said" and "rotating" in claim 25 (as suggested by the Examiner).

#### ***Claim Rejections - 35 USC 112***

The objections are believed to be overcome by the amendments made above. Particularly, claim 10 has been amended to depend from claim 9, claim 14 has been amended to depend from claim 11, claim 15 has been amended to depend from claim 11 (as suggested by the Examiner).

#### ***ISSUES UNDER 35 USC 102***

**Claim 25 has been rejected under 35 U.S.C. 102(b) as being anticipated by *Welch et al* (4,478,701).**

In contrast to *Welch*, claim 25 specifically requires, "...rotating a first gear; rotating a second gear via said rotating first gear when said first gear is operatively engaged with said second gear ..." While *Welch* may disclose a target support adjusting fixture, *Welch* does not teach or suggest using gears, and further gears that are operatively engaged. In *Welch*, the target

support adjusting fixture includes a chain drive assembly having a sprocket chain 86 disposed about sprockets 80 and 82 in operational engagement therewith. The sprockets are not gears and further they do not engage one another. Thus, the rejection is unsupported by the art and should be withdrawn.

In addition, *Welch* discloses a target not an electrode. While the target may serve as a cathode, the target is simply not an electrode as described in the present invention. A target (e.g., consumable product) is reduced by vaporization so that the vaporized target material diffuses throughout the chamber and deposits in the form of a thin film on the substrate. Accordingly, the rejection is unsupported by the art and should be withdrawn.

Claims 1-10 have been rejected under 35 U.S.C. 102(a) as being anticipated by *Lenz* (WO 99/67807).

The *Lenz* patent is not applicable as prior art because it would not be by another as it applies to the instant invention. Please see DECLARATION UNDER 37 CFR 1.132 in the priority document U.S. Patent No. 6,669,811.

If needed to overcome the rejection, a new declaration under 37 CFR § 1.132 can be supplied.

#### Allowable Subject Matter

Claims 16-24 have been allowed. Claims 14 and 15 have been amended to overcome the 35 USC 112 rejection. Claims 14 and 15 are therefore allowable (along with claims 11-13) if rewritten in independent form including all of the limitations of the base claims and any intervening claims.

### Summary

Applicant believes that all pending claims are allowable and respectfully requests a Notice of Allowance for this application from the Examiner. Should the Examiner believe that a telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below.

Respectfully submitted,  
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